



December 20, 2019

Neotract, Inc.  
Brian Gall  
Regulatory Affairs Manager  
4155 Hopyard Rd.  
Pleasanton, CA 94588

Re: K193269

Trade/Device Name: UroLift System (UL400)  
Regulation Number: 21 CFR 876.5530  
Regulation Name: Implantable Transprostatic Tissue Retractor System  
Regulatory Class: Class II  
Product Code: PEW  
Dated: November 25, 2019  
Received: November 26, 2019

Dear Brian Gall:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Jessica K. Nguyen, Ph.D.  
Acting Assistant Director  
DHT3B: Division of Reproductive,  
Gynecology and Urology Devices  
OHT3: Office of GastroRenal, ObGyn,  
General Hospital and Urology Devices  
Office of Product Evaluation and Quality  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)  
K193269

Device Name  
UroLift System (UL400)

### Indications for Use (Describe)

The UroLift System is indicated for the treatment of symptoms due to urinary outflow obstruction secondary to benign prostatic hyperplasia (BPH), including lateral and median lobe hyperplasia, in men 45 years of age or older.

Type of Use (Select one or both, as applicable)

☒ Prescription Use (Part 21 CFR 801 Subpart D)

☐ Over-The-Counter Use (21 CFR 801 Subpart C)

### CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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**03 510(k) SUMMARY****COMPANY INFORMATION**

NeoTract, Inc.  
4155 Hopyard Rd.  
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Registration Number: 3015181082

**SUBMISSION CORRESPONDENT**

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**DATE PREPARED**

25 November 2019

**DEVICE INFORMATION**

Trade Name: NeoTract® UroLift® System (UL400)  
Common Name: Implantable transprostatic tissue retractor system  
Classification Name: Implantable transprostatic tissue retractor system  
Product Code: PEW  
Regulation Number: 876.5530  
Classification: II  
Classification Panel: Gastroenterology/Urology

**DEVICE DESCRIPTION**

The UroLift System is designed to access the prostatic urethra and deliver one UroLift Implant through a lobe of the prostate. The UroLift System is inserted into the urethra through the penile orifice and used to displace the urethra toward the prostatic capsule. The UroLift Implant is then deployed transversely through the prostatic tissue. Multiple implants are deployed in the UroLift System procedure. The implants secure the retracted position of the urethra, thereby maintaining an expanded urethral lumen, reducing fluid obstruction and improving lower urinary tract symptoms (LUTS). This is accomplished by holding the approximated position of the inner (urethral) tissue and the outer (capsular) tissue of the prostate with the UroLift Implant. The procedure typically requires 2-6 implants to retract the obstruction. The UL400 (most recently cleared in K173087), consists of two main components, the UroLift Delivery Device (single use), and the UroLift Implants (one implant per delivery device). Each Delivery Device comes pre-loaded with one UroLift Implant.

**INDICATIONS FOR USE**

The UroLift System is indicated for the treatment of symptoms due to urinary outflow obstruction secondary to benign prostatic hyperplasia (BPH), including lateral and median lobe hyperplasia, in men 45 years of age or older.

**CONTRAINDICATIONS**

The UroLift System should not be used if the patient has:

- Prostate volume of >100 cc
- A urinary tract infection
- Urethra conditions that may prevent insertion of delivery system into bladder
- Urinary incontinence due to incompetent sphincter
- Current gross hematuria

**PREDICATE DEVICE**

The predicate device is the UroLift System by NeoTract (K173087).

Trade Name:	NeoTract UroLift System (UL400)
Common Name:	Implantable transprostatic tissue retractor system
Classification Name:	Implantable transprostatic tissue retractor system
Product Code:	PEW
Regulation Number:	876.5530
Classification:	II
Classification Panel:	Gastroenterology/Urology

**COMPARISON WITH THE PREDICATE DEVICE**

The UroLift System (UL400) described in this submission is substantially equivalent to the previously cleared generations of the device. The UL400 was previously cleared in K173087. This submission concerns the modification of a contraindication of the device and does not impact the device itself. The modification is to change one contraindication from “The UroLift System is contraindicated for men with Prostate volume of >80 cc” to “The UroLift System is contraindicated for men with Prostate volume of >100 cc”. This is based on a clinical literature review. The indications for use and remaining contraindications do not change as a result of this submission. Minor device modifications which were determined to not require a pre-market submission based on *Deciding When to Submit a 510(k) for a Change to an Existing Device Guidance for Industry and Food and Drug Administration Staff* are included in this submission.

**PERFORMANCE TESTING**

The modification of the contraindication does not impact the performance testing of the existing UroLift System. As such, the performance testing data provided with the predicate device (K173087) is applicable for the proposed device with a modified contraindication. The minor device modifications discussed were tested using test methods equivalent to the predicate device.

The basis for increasing the maximum prostate volume indicated in the contraindication for the UroLift System is based on clinical review of both sponsored and independent clinical studies that included men with prostate volumes greater than 80cc. These studies show that the symptom response, quality of life, uroflowmetry, adverse events,

and catheterization rates are equivalent to the outcomes of patients with prostate volumes less than 80cc.

### **BIOCOMPATIBILITY TESTING**

The UroLift System has been tested for biocompatibility and passed the relevant tests according to ISO 10993-1: *Biological evaluation of medical devices – Part 1: Evaluation and testing within a risk management process*. The modification of the contraindication does not impact the biocompatibility of the existing UroLift System. As such, the data provided with the predicate device (K173087) is applicable for the proposed device with a modified contraindication.

### **STERILIZATION AND SHELF-LIFE TESTING**

The modification of the contraindication does not impact the sterilization or shelf life of the existing UroLift System. As such, the data provided with the predicate device (K173087) is applicable for the proposed device with a modified contraindication.

### **CONCLUSION**

The data provided demonstrated the NeoTract UroLift System with a modified contraindication is as safe and effective, has the same intended use, technological characteristics and principles of operation as the predicate device. Therefore, the NeoTract UroLift System is substantially equivalent to the predicate devices.